

From: [Dan Peacock](#)
To: [John Lublinkhof](#)
Subject: Re: Revised Label Comments for 12455-61
Date: 12/15/2010 09:38 AM
Attachments: [012455-00061.20101214b.LiquatoxII EPA Amend Mitigation LabelFlow.doc](#)
[Revised Labeling Comments. 12455-61.12-15-2010.doc](#)

Dear Mr. Lublinkhof,

In reviewing Diphacinone products containing 0.1 or 0.2 Diphacinone (12455-9 and 12455-56, I found that these products all are supported by Cat 3 Acute Inhalation Data. When we originally registered this product (12455-61), Bell cited data on 12455-56 to support the acute toxicity of the product. Therefore, this product (12455-61) needs Cat 3 Inhalation text in the precautionary text and in the First Aid text.

Also, any concentrated anticoagulant (not ready-to-use), even Warfarin, needs a pregnancy warning.

Attached are my comments, which I trust will be the last ones.



Revised Labeling Comments, 12455-61.12-15-2010.doc

Thank you for your patience,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:

United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

▼ "John Lublinkhof" ---12/14/2010 08:53:46 PM---Dan, Sorry about that. Attached is the revised label showing 13.44 fl.oz. of

From: "John Lublinkhof" <jlublinkhof@belllabs.com>
To: Dan Peacock/DC/USEPA/US@EPA
Date: 12/14/2010 08:53 PM
Subject: Re: Revised Label Comments for 12455-61

Dan,

Sorry about that. Attached is the revised label showing 13.44 fl.oz. of bait concentrate.

Best regards,

John Lublinkhof
Bell Laboratories, Inc.
608-241-0202 Ext. 3138

-----Original Message-----

From: Peacock.Dan@epamail.epa.gov
To: "John Lublinkhof" <jlublinkhof@belllabs.com>
Date: Tue, 14 Dec 2010 16:22:13 -0500
Subject: Re: Revised Label Comments for 12455-61

> Dear Mr. Lublinkhof,
>
> You forgot to make this change:
>
>
> 2. In your "Use Restrictions", change "13 fl. oz. of bait" to
"13.44
> fl. oz of bait concentrate".
>
>
> You need to make this change because it is not accurate to say that
> this
> product is a "bait", itself. One must add water first..
>
>
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> |----->
> | From: |
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> |"John Lublinkhof"
> <jlublinkhof@belllabs.com>
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Peacock/DC/USEPA/US@EPA
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> | Subject: |
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> |Re: Revised Label Comments for 12455-
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> Dan,
>
> Attached, please find a clean label including the changes you
described
> below.
>
> Thanks,
>
> John Lublinkhof
> Bell Laboratories, Inc.
> 608-241-0202 Ext. 3138
>
> -----Original Message-----
> From: Peacock.Dan@epamail.epa.gov
> To: "John Lublinkhof" <jlublinkhof@belllabs.com>
> Date: Tue, 14 Dec 2010 12:10:23 -0500
> Subject: Re: Revised Label Comments for 12455-61
>
> > Dear Mr. Lublinkhof,
> >
> > I am writing up the approval letter but need these changes to your
> > Net
> > Contents for conform to 40 CFR 156(d):
> >
> > 1. Your Net Contents of the Outer Container Label needs to read as
> > follows:
> >
> >
> > Net Contents
> > 13.44 fl. oz. (8 x 1.68 fl. oz.) to
> > 2.63 quarts (50 x 1.68 fl. oz.)
> >
> > 2. In your "Use Restrictions", change "13 fl. oz. of bait" to
"13.44
> > fl. oz of bait concentrate".
> >
> > Sorry I did not catch this early. However, the changes will not
> > delay
> > anything.
> >
> > Dan
> >
> >
> >
> > |----->
> > | From: |
> > |----->
> >
> >
> -----
> -----
--|
> > |"John Lublinkhof" <jlublinkhof@belllabs.com>
> >
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